

# Exhibit 68

In the Matter of:  
Caryn Devins Strickland  
*vs*  
United States, et al.

Deposition of:  
**JILL LANGLEY**  
April 27, 2023



**(703) 331-0212**  
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1 mediation stage and that she had waited months and  
2 had not heard back.

3 Q How did you respond to that?

4 A What I remember telling her was that I  
5 didn't understand the concept at all of disqualifying  
6 the party from representing itself.

7 And so I do -- I don't know what I said  
8 to her about the delay in getting an answer back but  
9 I remember -- and am seeing in my notes -- thinking  
10 that it would surprise me if disqualifying the  
11 defendant from being the defendant would be granted.

12 Q Did you talk with Caryn about remedies at  
13 the complaint stage?

14 A I don't remember.

15 The only question -- the only topic that  
16 I remember coming up late in our meeting was her  
17 asking what would happen if the defender, like if the  
18 presiding judicial officer at the end of the  
19 complaint stage -- because that's when remedies  
20 happen, after there has been a decision on the  
21 merits -- what would happen if the defender refused  
22 to comply with the orders.

1 Q And --

2 A And I said I didn't remember what -- I  
3 was not familiar with the -- how a defender could be  
4 unappointed.

5 In contrast, if I'm a court employee and  
6 the presiding judicial officer orders the clerk of  
7 court to provide some remedy, the clerk of court, I  
8 understand, is in a very direct employment  
9 relationship with the chief judge and the judges on  
10 the court.

11 And what I remember telling Caryn is I  
12 literally did not know enough about the relationship  
13 between a defender -- and I'm talking about the unit  
14 executive defender -- and the judges on the Court of  
15 Appeals. And so I remember telling her that I didn't  
16 know what would happen.

17 I certainly told her that they are  
18 obligated -- a defender would be obligated under the  
19 plan to take those remedies and to comply with the  
20 order, but I didn't know what would happen if they  
21 refused to follow that.

22 Q Do you know -- I'm just trying to make

1 sure I understand your answer.

2                   Are you saying that you didn't know if  
3 the Court -- if a presiding judicial officer would  
4 have authority to enforce remedies ordered under the  
5 plan against the defender?

6                   A         No. I knew that they had the power to  
7 enforce it.

8                   But the mechanics of what does that  
9 enforcement mean, what I didn't know was would they  
10 have the power to fire the defender for failing to  
11 comply with a presiding judicial officer decision.

12                  And after our meeting, I did learn about  
13 a statute that describes how a defender can be  
14 removed from office for misconduct in office or  
15 neglect of duty; and as a lawyer I would make the  
16 argument that failing to comply with a presiding  
17 judicial officer's order would be neglect of duty.

18                  So, I didn't know that.

19                  Q         At the time.

20                  A         So that was -- my answer to her was, "I  
21 don't know what would happen."

22                  Q         Okay.

1 A But I also want to be clear when you talk  
2 about remedies I am talking exclusively about a  
3 post-decision remedy ordered by a presiding judicial  
4 officer at the end of the complaint stage --

5                    I understand?

6           A        -- not settlement resolutions or other  
7 informal resolutions. I'm talking about remedies  
8 under the EDR plan.

9 Q Does the EDR plan contemplate any  
10 distinction between someone's interests as, say, a  
11 unit executive and their interests if they are also  
12 an accused party?

**A** Say it again.

16                   QUESTION: Does the EDR plan  
17                   contemplate any distinction between  
18                   someone's interests as, say, a unit  
19                   executive and their interests if  
20                   they are also an accused party?

21 THE WITNESS: So you are going to have to  
22 excuse me, but I'm going to stop and reread this to